

**IN THE U.S. DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BLUDGEON RIFFOLA LTD.,

Plaintiff,

v.

ALI GEGE STORE, et al.,

Defendants.

Case No. 21-cv-02525

Judge Gary Feinerman

Magistrate Judge Beth W. Jantz

**PLAINTIFF’S MOTION TO STRIKE
DEFENDANT’S MOTIONS [96] AND [117]**

Plaintiff Bludgeon Riffola Ltd. (“Plaintiff”), by its counsel, hereby moves this Honorable Court to strike defendant Womens Dresses -YIISU (“Defendant”) Motion to Vacate Preliminary Injunction Order [96] and Defendant’s Motion to Dismiss Plaintiff’s Complaint [117] (“Defendant’s Motions”).

The Motions were filed *pro se* by Fang Hong Fang, as the operator of Womens Dresses - YIISU. [96] at p. 3; [117] at 10. Defendant Womens Dresses -YIISU is a business entity, therefore, it is “not permitted to litigate in a federal court unless it is represented by a lawyer licensed to practice in that court.” *United States v. Hagerman*, 545 F.3d 579, 581 (7th Cir. 2008) (citations omitted). Even if Fang Hong Fang is the owner of this entity, Womens Dresses -YIISU still needs to be represented by counsel licensed to practice before this Court. *United States v. Certain Real Property*, 381 F. Supp. 3d 1007, 1009 (E.D. Wisc. 2018) (granting motion to strike claim filed by an authorized representative of a corporation because it was not filed by an attorney); *M&M Ventures (2014) Ltd. v. The Individuals, et al.*, No. 22-cv-00206 (N.D. Ill. July 26, 2022) (Dkt. No. 86) (“Liu Ping, the owner of maikouhai, filed a pro se appearance and was added to the docket as

a defendant. However, as an entity, maikouhai cannot represent itself, nor can a nonlawyer represent maikouhai, so maikouhai must obtain an attorney and that attorney must file an appearance on the docket. Accordingly, maikouhai's motion to dismiss is struck without prejudice.”).

Upon information and belief, Fang Hong Fang is not an attorney licensed to practice before this Court on behalf of Womens Dresses -YIISU. *See, e.g., Wham-O Holding, Ltd. v. The P'ships*, No. 20-cv-03761 (N.D. Ill. Oct. 16, 2020) (Dkt. No. 61) (granting motion to strike document because it “is not a proper pleading filed by an attorney of record for a party”); *CamelBak Products, LLC v. The P'ships*, 20-cv-01542 (N.D. Ill. Aug. 31, 2020) (Dkt. No. 35) (striking motion filed by a person that had “not entered an appearance and is neither a member of the general bar of this court nor has sought admittance pro hac vice, as required by Local Rule 83.12”). Accordingly, Plaintiff respectfully requests that this Court deny and strike Defendant's Motions. Permitting an organized business entity to proceed as a *pro se* defendant without the assistance of counsel continues to unnecessarily burden the Court and prejudice Plaintiff.

For the above reasons, Plaintiff respectfully requests that this Court strike Defendant's Motions [96] and [117].

Dated this 2nd day of September 2022.

Respectfully submitted,

/s/ Justin R. Gaudio

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Counsel for Plaintiff Bludgeon Riffola Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send a “Notice of E-Filing” to the parties of record in this case, including Defendant Womens Dresses -YIISU..

/s/ Justin R. Gaudio
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